

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA**

THE CITY OF HUNTINGTON,
Plaintiff,

v.

AMERISOUCEBERGEN DRUG CORPORATION, *et al.*
Defendants

Civil Action No. 3:17-01362

CABELL COUNTY COMMISSION,
Plaintiff,

v.

AMERISOUCEBERGEN DRUG CORPORATION, *et al.*
Defendants

**PLAINTIFFS' UNDER SEAL APPENDIX OF EXHIBIT 1 IN SUPPORT OF
OPPOSITION TO DEFENDANTS' *DAUBERT* MOTION TO EXCLUDE THE
OPINIONS OF JAMES GELDHOF**

October 23, 2020

This Appendix consists of the attached Exhibit 1 (excerpts from the transcript of the deposition of James Geldhof, conducted on September 22, 2020). These materials are filed under seal.

Dated: October 23, 2020

Respectfully submitted,

THE CITY OF HUNTINGTON

CABELL COUNTY COMMISSION

/s/ Anne McGinness Kears

Anne McGinness Kears
WVSB No. 12547
Joseph F. Rice
MOTLEY RICE LLC
28 Bridgeside Blvd.
Mount Pleasant, SC 29464
Tel: 843-216-9000
Fax: 843-216-9450
akearse@motleyrice.com
jrice@motleyrice.com

/s/ Anthony J. Majestro

Anthony J. Majestro
WVSB No. 5165
POWELL & MAJESTRO, PLLC
405 Capitol Street, Suite P-1200
Charleston, WV 25301
304-346-2889 / 304-346-2895 (f)
amajestro@powellmajestro.com

Linda Singer
David I. Ackerman
MOTLEY RICE LLC
401 9th Street NW, Suite 1001
Washington, DC 20004
Tel: 202-232-5504
Fax: 202-386-9622
lsinger@motleyrice.com
dackerman@motleyrice.com

/s/ Peter J. Mougey

Peter J. Mougey, Esq.
LEVIN, PAPANTONIO, THOMAS
MITCHELL, RAFFERTY & PROCTOR, P.A.
316 South Baylen Street, Suite 600
Pensacola, FL 32502-5996
Telephone: (850) 435-7068
Facsimile: (850) 436-6068
pmougey@levinlaw.com

/s/ Paul T. Farrell, Jr.

Paul T. Farrell, Jr.
WVSB No. 7443
FARRELL LAW
422 Ninth Street, 3rd Floor
Huntington, WV 25701
Tel: (304) 654-8281
paul@farrell.law

Michael A. Woelfel
WVSB No. 4106
WOELFEL AND WOELFEL, LLP
801 Eighth Street
Huntington, West Virginia 25701
Tel. 304.522.6249
Fax. 304.522.9282
mikewoelfel3@gmail.com

Charles R. "Rusty" Webb
WVSB No. 4782
THE WEBB LAW CENTRE, PLLC
716 Lee Street, East
Charleston, West Virginia 25301
Telephone: (304) 344-9322
Facsimile: (304) 344-1157
rusty@rustywebb.com

On the Brief:

Page A. Poerschke, Esq.
Laura S. Dunning, Esq.
LEVIN, PAPANTONIO, THOMAS
MITCHELL, RAFFERTY & PROCTOR, P.A.
316 South Baylen Street, Suite 600
Pensacola, FL 32502-5996
Telephone: (850) 435-7068
Facsimile: (850) 436-6068
ppoerschke@levinlaw.com
ldunning@levinlaw.com

Tyler W. Hudson, Esq.
WAGSTAFF & CARTMELL, LLP
4740 Grand Avenue, Suite 300
Kansas City, MO 64112
Telephone: (816) 701-1177
Facsimile: (816) 531-2372
THUDSON@WCLLP.COM

CERTIFICATE OF SERVICE

I certify that on October 23, 2020, a copy of the foregoing was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system. This filing will also be served on all parties by email to: Track2OpioidDefendants@ReedSmith.com and mdl2804discovery@motleyrice.com.

/s/ Peter J. Mougey

Exhibit 1

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA

* * * * *

THE CITY OF HUNTINGTON,
Plaintiff,

vs.

CIVIL ACTION
NO. 3:17-01362

AMERISOURCEBERGEN DRUG
CORPORATION, et al.,

Defendants.

CABELL COUNTY COMMISSION,

Plaintiff,

vs.

CIVIL ACTION
NO. 3:17-01665

AMERISOURCEBERGEN DRUG
CORPORATION, et al.,

Defendants.

* * * * *

Videotaped and videoconference deposition of
JAMES GELDHOF taken by the Defendants under the Federal
Rules of Civil Procedure in the above-entitled action,
pursuant to notice, before Teresa L. Harvey, a West
Virginia notary public and Registered Diplomat
Reporter, the witness appearing via videoconference from
Detroit, Michigan, West Virginia, on the 22nd day of
September, 2020.

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APPEARANCES:

APPEARING FOR THE PLAINTIFFS:

Ethan DuBois, Esquire (via Zoom)
MOTLEY RICE
28 Bridgeside Boulevard
Mt. Pleasant, SC 29464

Paul T. Farrell, Jr., Esquire
FARRELL LAW
422 Ninth Street
3rd Floor
Huntington, WV 25714-1180

Amy J. Quezon, Esquire
McHUGH FULLER LAW GROUP
108 ½ Capitol Street, Suite 300
Charleston, WV 25304

APPEARING FOR THE DEFENDANT CARDINAL HEALTH:

Jennifer G. Wicht, Esquire
WILLIAMS & CONNOLLY
725 Twelfth Street, N.W.
Washington, DC 20005

CAREY, SCOTT, DOUGLAS & KESSLER
901 Chase Tower
707 Virginia Street, East
Charleston, WV 25323

APPEARING FOR THE DEFENDANT AMERISOURCEBERGEN:

Al Sebok, Esquire
Gretchen M. Callas, Esquire
Sean D. Thomas, Esquire
Rob Aliff, Esquire
JACKSON KELLY
500 Lee Street, East
Suite 1600
Charleston, WV 25322-0553
Joseph J. Mahady, Esquire (via Zoom)
REED SMITH

1 Three Logan Square
1717 Arch Street, Suite 3100
2 Philadelphia, PA, 19103
3

4 APPEARING FOR THE DEFENDANT McKESSON CORPORATION:

5 Paul W. Schmidt, Esquire
Covington & Burling
The New York Times Bldg.
6 620 Eighth Avenue
New York, NY 10018-1405
7

8 Christopher K. Eppich, Esquire
COVINGTON & BURLING
9 1999 Avenue of the Stars
Suite 3500
10 Los Angeles, CA 90067
11

12 Carol Dan Browning, Esquire
Carolyn Purcell Michener, Esquire
Clayton Bailey, Esquire
13 STITES & HARBISON, PLLC
400 West Market Street, #1800
14 Louisville, Kentucky 40202
15 Jeffrey M. Wakefield, Esquire
Jason L. Holliday, Esquire
16 Morgan E. Villers, Esquire
FLAHERTY, SENSABAUGH & BONASSO
17 200 Capitol Street
Charleston, WV 25301
18

19 Clayton L. Bailey, Esquire
COVINGTON & BURLING
One City Center
20 850 Tenth Street NW
Washington, DC 20001
21

22 ALSO PRESENT:

23 Chris Leigh, Videographer
24

1 A. When they asked me to prepare this witness
2 report, the purpose of it was to assist the court in
3 giving an inside look or basically DEA's role within the
4 closed system of distribution. Knowing that, I wanted
5 to look at certain documents I thought would impact my
6 ability to make that -- you know, that -- that report.

7 Q. And what were those categories of documents you
8 wanted to look at that would impact that report?

9 A. I wanted to look at the actions taken by DEA.
10 I wanted to take a look at the Congressional inquiry
11 into West Virginia. I wanted to look at correspondence
12 between DEA and HDMA in guiding -- in policy guidance.
13 I'm trying to think of anything else off the top of my
14 head. There were other -- I wanted to look at the --
15 the suspicious -- the -- I'm sorry, the meetings that
16 Rannazzisi had, the distributor initiative meetings. I
17 wanted to look at Rannazzisi's letter. I wanted to look
18 at the letters that DEA sent -- the Math* letters where
19 he sent back to I think it was Mr. Walker, a culmination
20 of the meetings. I'd have to go through the report and
21 look at others. Those are off the top of my head.

22 Q. Why was it important to you to look at actions
23 taken by the DEA?

24 A. Because I think it summarizes our response to